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8 *Attorneys for Plaintiff*

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 MONICA CURTIS, an Individual,

13 Plaintiff,

14 vs.

15 THE JUSTICE COURT OF THE NORTH
16 LAS VEGAS TOWNSHIP, CLARK
17 COUNTY, STATE OF NEVADA,

18 Defendants.

CASE NO.: 2:20-cv-2354

STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE

19
20 Plaintiff MONICA CURTIS, (“Plaintiff”), by and through her attorney, HKM
21 Employment Attorneys LLP, hereby stipulate and agree as follows:

22 WHEREAS, Plaintiff, now a former employee of Defendant, has brought claims against
23 Defendant for unlawful workplace discrimination and retaliation based on race under Title VII
24 of the Civil Rights Act of 1964 (“Title VII”), 42 U.S.C. §2000e et seq.; 42 U.S.C. §12101 et.
25 seq.; for monetary damages to redress the deprivation of rights secured to the Plaintiff by the
26 Civil Rights Act of 1871, 42 U.S.C. § 1981; for violations under the Fair Labor Standards Act
27 of 1938, 29 U.S.C. § 201 et.; seq.; and for certain claims brought pursuant to the Nevada
28 Revised Statutes;

1 WHEREAS, Plaintiff initiated a Charge of Discrimination with the Equal Employment
2 Opportunity Commission (“EEOC”) and on or about October 1, 2020, Plaintiff received her
3 Notice of Right to Sue for her EEOC charges (No. 34B-2018-01335 and No. 34B-2019-00358);

4 WHEREAS, Plaintiff filed her Complaint against Defendant on December 30, 2020
5 (ECF No. 1);

6 WHEREAS, Defendant’s Answer to her Complaint is was due February 4, 2021, after
7 an agreed to extension (*see* ECF No. 11 and No. 12);

8 WHEREAS, Plaintiff acknowledges that all claims related to Plaintiff’s employment
9 with Defendant, including the claims alleged in the Complaint and Charges, are barred by
10 sovereign immunity and as such fall within the jurisdiction of the Eighth Judicial District Court
11 of Clark County, Nevada.

12 **IT IS HEREBY STIPULATED** by and between Defendant and Plaintiff as follows:

13 1. All of Plaintiff’s claims relating to her employment with Defendant, including
14 those alleged in the Complaint and Charges, shall be dismissed with prejudice, with each side
15 bearing their own attorneys’ fees and costs;

16 2. If Plaintiff brings the claims contained in her Complaint (ECF No. 1) in the
17 Eighth Judicial District Court of Clark County, Nevada, Defendant will not raise any statute of
18 limitation issues that were not present when Plaintiff filed her Complaint (ECF No. 1).

19 3. Defendant’s Answer to Plaintiff’s Complaint (ECF No. 1) is unnecessary as it is
20 now moot.

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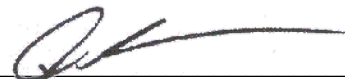
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IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: February 9, 2021

1 Dated this 5th day of February 2020.

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3 By: /s/ Rex Martinez
4 **REX M. MARTINEZ** (Bar No. 15277)
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